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November 22, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service
MM Docket No. 87-268
Comments

Dear Mr. Caton:

Tanana Valley Television Company, through counsel, hereby files the original and five copies of its comments to the Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268. Please contact the undersigned if you have any questions.

Sincerely,

Ann K. Ford
Michael Ruger

Enclosures

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
	)	
Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service	)	MM Docket No. 87-268
	)	
	)	

To: The Commission

COMMENTS

1. Tanana Valley Television Company ("Tanana Valley"), licensee of Station KFXF(TV), Channel 7, Fairbanks, Alaska, and LPTV Station K13XD, Channel 13, Fairbanks, hereby files these Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996) ("Sixth NPRM"). Tanana Valley encourages the Commission to provide DTV allotments for its Station KFXF(TV) and for Channel 13 at Fairbanks concurrently with other DTV channel allotments.

Background

2. Station KFXF(TV), a Fox affiliate, and LPTV Station K13XD, a CBS affiliate, provide much-needed, over-the-air broadcast services to the residents in and around Fairbanks. There are only four commercial full-power channels offering service to the Fairbanks area--Stations KFXF(TV), KATN, KJNP and KTVF. Stations KATN, KJNP and KTVF have received DTV allotments in the Commission's proposed DTV allotment plan.

3. Station KFXF(TV) did not receive a DTV allotment, as an application had not been filed for Channel 7 prior to the October

24, 1991, cut-off date for DTV allotments.[1] See Sixth NPRM at ¶ 9. LPTV Station K13XD did not receive a DTV allotment due to its status as a low power facility, despite its provision of network service to the Fairbanks area.[2] Although Tanana Valley has filed an application to operate Channel 13 as a full-power television station, that application was filed after the cut-off date as well.[3] Id. Under the FCC's proposed DTV allotment plan, Fairbanks Channel 13 would be used as a DTV allotment, thereby precluding the operation of Station K13XD.

Discussion

4. Given the shortage of full-power television stations serving the Fairbanks area and the associated low demand for broadcast spectrum, the Commission should allot a DTV channel for Station KFXF(TV) in the final version of its DTV channel plan. Provision of a DTV allotment will ensure the continued viability of

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[1]Tanana Valley filed an application for operation of its LPTV station on Fairbanks Channel 7 on June 23, 1988 (FCC File No. BPTVL-880623SJ), and received a construction permit for Station K07UU on November 6, 1989. That facility was licensed on November 10, 1992. In 1994, Tanana Valley filed an application to operate a full-power television service on Channel 7 (FCC File No. BPCT-940715KN), and the application was granted on January 27, 1995. Tanana Valley filed a license application on March 9, 1995 (FCC File No. BLCT-950309KF), which was granted on September 20, 1996.

[2]Tanana Valley filed an application to operate its LPTV station on Channel 13 on April 14, 1994 (FCC File No. BPTVL-9405415RS). That application was granted on June 8, 1995. Tanana Valley subsequently filed a license application (FCC File No. BLTVL-960823JB), which was granted on September 20, 1996.

[3]Tanana Valley filed its application for operation of a full-power television station on Channel 13 on September 20, 1996 (FCC File No. BPCT-960920LC). That application, as well as two subsequently filed competing applications, are pending.

the station during the transition to digital television. Furthermore, allotting a DTV channel at this time for Station KFXF(TV) is an efficient use of Commission resources. Rather than examining the Fairbanks market on a piecemeal basis in the future, the Commission can establish a DTV allotment plan that will accommodate all operating stations at one time.

5. The Commission should also take steps to ensure the continuing operation of Station K13XD by avoiding the use of Channel 13 as a DTV allotment in Fairbanks. As there is an abundance of broadcast spectrum in Fairbanks, alternative channels are available, as described below. Furthermore, the Commission should allot a DTV channel for Channel 13 at Fairbanks. As an affiliate of a major television network, Tanana Valley's LPTV Station K13XD provides much-needed service to Fairbanks. Given Tanana Valley's pending application, it is highly likely that Channel 13 will operate as a full-service station in the future. Although that application was filed after the cut-off date for consideration of a DTV allotment for vacant but applied-for channels, the vast availability of spectrum in the Fairbanks market ensures that DTV channels are available. Accommodating Fairbanks Channel 13 at this time will avoid the necessity of initiating a separate proceeding to allot a DTV channel at some future date, thereby conserving Commission resources.

6. As the attached engineering study demonstrates, there is more than sufficient spectrum in Fairbanks to permit the reservation of DTV channels for all operating television stations

in the Fairbanks area, including Stations KFXF(TV) and K13XD. The engineering study offers two channel allotment scenarios, one presuming the adoption of the "core spectrum" plan and the second presuming the availability of channels outside the "core spectrum." The channels proposed in the engineering study should be considered illustrative of the availability of spectrum, rather than the only DTV channels available for allotment to Fairbanks.

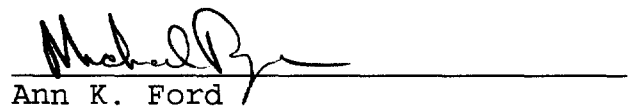
Conclusion

7. The Fairbanks market may be unique in the nation. The four television stations in and around the community provide the only available broadcast signals, while a low power television station provides a necessary network affiliate service. Residents of the Fairbanks area are heavily dependent upon over-the-air television services for local news and weather, as cable penetration rates are low; only 38% of Fairbanks television households subscribe to cable.[4] The Commission should, therefore, take steps to ensure that local residents will continue to enjoy local broadcast services during and after the transition to digital television. The availability of sufficient spectrum allows the allotment of DTV channels to all operating television services, both full-power and LPTV, in the Fairbanks market at this time. In

[4] See 1996 Television and Cable Factbook at F-15.

light of the above, Tanana Valley Television respectfully requests that the Commission provide DTV allotments to both Station KFXF(TV) and LPTV Station K13XD.

Respectfully submitted,



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Filed: November 22, 1996

TECHNICAL EXHIBIT
PREPARED ON BEHALF OF
TANANA VALLEY TELEVISION COMPANY
IN SUPPORT OF COMMENTS IN
SIXTH FURTHER NOTICE OF PROPOSED RULE MAKING IN
MM DOCKET NO. 87-268

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of Tanana Valley Television Company ("TVTC") in support its comments in the Federal Communications Corporation's (FCC) Sixth Further Notice Of Proposed Rule Making ("FNPRM")in MM Docket No. 87-268. This proceeding concerns the implementation of digital television (DTV) and its impact on the existing television broadcast service. In the FNPRM the FCC has proposed technical criteria to be used in assigning channels for DTV service and requested comments on these proposals. In particular, a table of allotments for DTV assignments, with associated effective radiated power (ERP) to replicate existing coverage was proposed for eligible existing NTSC[1] broadcast stations.

TVTC is the licensee of full-power TV station KFXF (BLCT-950309KF) and Low Power TV (LPTV) station K13XD (BLTVL-960823JB), both at Fairbanks, Alaska. TVTC is also an applicant for a full-power TV operation on vacant VHF channel 13 (BPCT-960920LC) which is currently occupied by K13XD. The primary purpose of these comments is to demonstrate that there is sufficient spectrum available in the Fairbanks area to allocate DTV channels for use by Station KFXF and vacant, but applied-for, channel 13 when the final DTV table of allotments is adopted. In

[1] The existing TV broadcasting system is referred to as NTSC after the National Television Systems Committee, and industry group

addition, two possible DTV channel allotment plans are set forth. Finally, TVTC proposes to utilize the current NTSC operations for its final DTV operations.

Station KFXF currently operates on VHF TV channel 7 (174-180 MHz) with a directional antenna maximum ERP of 7.76 kW and an antenna height above average terrain (HAAT) of 18 meters. In addition, KFXF has a pending application to relocate its transmitter site to the authorized K13XD site and operate with a directional antenna maximum ERP of 7.76 kW and an HAAT of 268 meters (BMPCT-960621KK). Station KFXF provides FOX network programming to the Fairbanks area. Prior to activation of full-power station KFXF, TVTC operated LPTV station K07UU on then vacant channel 7 at Fairbanks which also provided FOX network programming to the Fairbanks area.

Station K13XD is currently licensed to TVTC to operate on channel 13, a vacant full-service TV allotment in Fairbanks, with a directional antenna maximum ERP of 0.55 kW and an antenna radiation center height above mean sea level (RCAMSL) of 522 meters. In addition, K13XD has a pending application (filed during the last LPTV "major change" window in May, 1996) to increase its directional antenna maximum ERP to 0.74 kW (FCC File No. BMPTVL-960517UG). Station K13XD provides CBS network programming to the Fairbanks area. On September 20, 1996 TVTC filed an application for full-service operation on channel 13 from the current K13XD site (FCC File No. BPCT960920LC).

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established in 1940 to develop technical standards for television broadcast.

DTV Spectrum Availability

The FNPRM did not propose a DTV channel for either KFXF on channel 7 or vacant channel 13 as neither was considered "eligible" when the DTV table was developed. However, there appears to be sufficient TV spectrum available in the Fairbanks area to permit reservation of DTV spectrum for both KFXF and the future channel 13 operation when the final DTV table of allotments is adopted.

Figure 1, attached, is a tabulation of all full-service TV station allotments and authorizations within 322 kilometers (200 miles) of the proposed KFXF/K13XD site. As shown, there are only four licensed commercial TV stations (KATN, KJNP-TV, KFXF, KTVF), one licensed noncommercial TV station (KUAC-TV), and one vacant allotment (channel 13, with at least 2 applications pending, including one filed by TVTC) within 322 kilometers and they are all located in Fairbanks area. These five existing stations and one allotment, all located at Fairbanks, are all assigned to the VHF band.[2] Therefore, the entire UHF band is available for future DTV operations in addition to spectrum that could be utilized for DTV operations in the VHF band, discussed below,

Furthermore, Fairbanks is considered "underserved" by commercial full-service TV stations as there are currently only 4 services available and the FCC considers an area receiving less than 5 services to be underserved.[3] Therefore, the FCC's final DTV allotment

[2] There is only one UHF TV allotment within the entire state of Alaska, namely, channel 33 at Anchorage. See Section 73.602 (Table of Allotments) of the FCC's Rules.
[3] See paragraph 19 of the Report and Order in MM Docket No. 87-8 (FCC 91-182, adopted June 13, 1991; released July 8, 1991) concerning

table should reserve spectrum for both KFXF and vacant channel 13.

Fairbanks DTV Channel Options

As part of the implementation of DTV operations in this proceeding, the FCC proposed to provide eligible stations with the temporary use of a second channel for DTV operations during a transition period, and at the end of the transition period one of the two channels would be reclaimed. Furthermore, the FNPRM proposes to locate all DTV service in a "core" region consisting of VHF channels 7-13 (174-216 MHz) and UHF channels 14-51 (470-698 MHz). The spectrum located outside the "core" band, VHF channels 2-6 (54-62 MHz and 76-88 MHz) and UHF channels 52-69 (698-806 MHz) would conceivably become available for other services.

TVTC proposes two possible options for DTV operations in the Fairbanks area. Option 1 presumes that the FCC's "core" band approach is not adopted. Option 2 would utilize the same DTV channels for each station as proposed in the FNPRM, with the exception of KTVF's DTV channel 13 proposal, and would use the "core" band for alternate channel proposals. Both options are based on each station reverting back to their current NTSC channels for DTV operation after the transition period as discussed below.[4]

Option 1 - Under this option, the "core" band approach would not be adopted. In addition, a station's first adjacent VHF channel would be utilized for its "interim"

Television Satellite Stations Review of Policy and Rules for definition of "underserved" area.
[4] See paragraph 36 of the FNPRM.

DTV operation, where possible, with the final DTV operation on its current channel. This is based on the FCC's proposed use of first adjacent channel DTV and NTSC operations in the same area as proposed for many stations. In addition, this option would have the least adverse impact on the existing UHF LPTV operations in Fairbanks Figure 2 provides a tabulation of all existing, authorized and proposed Fairbanks LPTV stations and, as shown, the list contains twenty-seven authorized LPTV stations at Fairbanks. Finally, if a VHF station could not be accommodated within the VHF band, the lowest available UHF channel was specified to take advantage of the "dipole factor".[5] The following tabulates each Fairbanks full-service station and vacant channel 13 allotment, its current NTSC channel, proposed DTV channel as proposed in the FNPRM and alternate DTV channel as proposed by TVTC (shown in boldface):

Station/Allotment	Current NTSC Channel	Proposed DTV Channel Allotment	
		FCC	TVTC (Option 1)
KATN, Fairbanks, AK	2	44	**15**
KNJP-TV, North Pole, AK	4	28	**5**
KFXF, Fairbanks, AK	7	None	**8**
KUAC-TV, Fairbanks, AK	9	5	**10**
KTVF, Fairbanks, AK	11	13	**12**
Vacant Channel 13 (K13XD)	13	None	**19**

Option 2 - Under this option, the FCC's proposed DTV channels are used, with the exception of KTVF's DTV channel 13 which would conflict with vacant NTSC channel

[5] The "dipole factor" refers to the difference in intercepted energy that a receiving antenna can capture from a transmitted field across the UHF band. As a result, more ERP is required at channel 69 than at channel 14 to achieve the same coverage.

13. In addition, all alternate DTV channels are located in the "core" band. The following tabulates each Fairbanks full-service station and vacant channel 13 allotment, its current NTSC channel, proposed DTV channel as proposed in the FNPRM and alternate DTV channel as proposed by TVTC (shown in boldface):

	Current	DTV Proposed Channel Allotment	
Station/Allotment	NTSC Channel	FCC	TVTC (Option 2)
KATN, Fairbanks, AK	2	44	**44**
KNJP-TV, North Pole, AK	4	28	**28**
KFXF, Fairbanks, AK	7	None	**15**
KUAC-TV, Fairbanks, AK	9	5	**5**
KTVF, Fairbanks, AK	11	13	**12**
Vacant Channel 13 (K13XD)	13	None	**19**

Use of Current NTSC Channel for DTV Operation

As noted above, the FCC has proposed to provide eligible stations with the temporary use of a second channel for DTV operations during a transition period, and at the end of the transition period one of the two channels would be reclaimed. TVTC supports the assignment of a second channel for DTV use during the transition period similar to what has been proposed by the FCC. TVTC also proposes to return to its current VHF channel for the final DCTV operation and ultimate DTV replication of its present NTSC coverage.

With replication of current service and interference reduction as the goals, and cost

considerations a significant factor, it is believed that all stations should return to their present NTSC channels for the final DTV operations. This will provide the best means of replicating present coverage as it will involve less power, provide spectrum efficiency, cause less interference, have the least adverse impact on LPTV operations and permit possible spectrum reclamation in the future.

As evidenced by the FCC's proposed DTV allotment table, inband VHF DTV allotments have significantly lower power than their NTSC counterparts to provide service replication.[6] However, DTV allotments for existing NTSC VHF stations located in the UHF band require significantly higher power to replicate the VHF coverage.[7] For instance, there are 270 low VHF NTSC assignments in the FCC's proposed DTV allotment table. The average NTSC ERP for these assignments is 87.4 kW. The average antenna HAAT is 433 meters (1420 feet). The FCC allotted high VHF DTV channels to 6 of these assignments, and UHF DTV channels to the remainder. The average DTV ERP for the 6 high VHF allotments is 17.2 kW. The average DTV ERP for the 264 UHF allotments is 3521 kW.

There are 376 high VHF NTSC assignments in the FCC's proposed DTV allotment table. The average NTSC ERP for these assignments is 266 kW, and the average antenna HAAT is 433 meters (1420 feet). The FCC allotted low VHF DTV channels to 4 of these assignments, high VHF DTV channels to 57 of the assignments, and UHF DTV channels to

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[6] KUAC-TV's NTSC operation on VHF channel 9 at Fairbanks with an ERP of 46.8 kW requires an ERP of 1.1 kW on VHF channel 5 for its DTV operation.

[7] KNJP-TV's NTSC operation on VHF channel 4 at Fairbanks with an ERP of 19.2 kW requires an ERP of 436.5 kW on UHF channel 28 for its DTV operation.

the remainder. The average DTV ERP for the 4 low VHF allotments is 2.3 kW. The average DTV ERP for the 57 high VHF channels is 5.6 kW. For the 315 UHF DTV channels, the average ERP is 1715 kW.

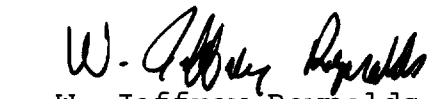
The average TV station going from a low VHF channel to a UHF DTV channel will require its ERP to be increased from 87.4 kW (peak) to 3521 kW (average) in order to replicate the present coverage. The high VHF station going to a UHF DTV channel will require its ERP to be increased from 266 kW (peak) to 1715 kW (average) in order to replicate the present coverage.

Based on the above, location of the final DTV operation "inband" will require substantially less power and, thus, lower operating costs. In addition, with less power, there will be less interference on the channels (and more service) as the DTV-to-DTV interference ratios are more favorable than the NTSC-NTSC ratios. This will provide opportunities for improvement in service, or the addition of new or relocated stations.

Summary

In summary, TVTC has demonstrated that there is sufficient TV spectrum available in the Fairbanks area to allocate DTV channels for use by Station KFXF and vacant, but applied-for, channel 13 when the final DTV table of allotments is adopted. In addition, two possible DTV channel allotment plans have been set forth which would

accommodate these proposed DTV operations. Finally, TVTC proposes to utilize current NTSC operations for its final DTV operations.



W. Jeffrey Reynolds

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Suite 700
Sarasota, Florida 34236

November 19, 1996

FAIRBANKS LPTV STATIONS

Job Title :Fairbanks, AK
Sorted by Channel
Channels 2 to 69

FCC TV DB Date : 11/07/96
Coordinates : 64-55-20 147-42-55

Call Status	City State FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km)	Distance (mile)
K13XD	FAIRBANKS	13	0.55 DA	64-55-20	.0	.00	.00
LIC	AK BLTVL-960823JB		522 max.	147-42-55			
Name :	TANANA VALLEY TELEVISION COMPANY						
K13XD	FAIRBANKS	13	0.74 DA	64-55-20	.0	.00	.00
APP	AK BMPTVL-960517UG		522 max.	147-42-55			
Name :	TANANA VALLEY TELEVISION COMPANY						
K14JL	FAIRBANKS	14	29.4 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JZ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K16DW	FAIRBANKS	16	29.5 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JY		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K18ED	FAIRBANKS	18	28.4	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960610JA		731 max.	148-03-10			
Name :	GREENTV CORP.						
K20FF	FAIRBANKS	20	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JX		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K22EY	FAIRBANKS	22	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960529JW		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K24EG	FAIRBANKS	24	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JV		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K26EL	FAIRBANKS	26	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JU		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K28ES	FAIRBANKS	28	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KJ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K30ET	FAIRBANKS	30	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JK		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K34EJ	FAIRBANKS	34	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JJ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K36ED	FAIRBANKS	36	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KI		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K38EL	FAIRBANKS	38	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JL		736 max.	148-03-10			
Name :	GOLDBELT, INC.						

FAIRBANKS LPTV STATIONS

Job Title :Fairbanks, AK
Sorted by Channel
Channels 2 to 69

FCC TV DB Date : 11/07/96
Coordinates : 64-55-20 147-42-55

Call Status	City State FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km)	Distance (mile)
K13XD	FAIRBANKS	13	0.55 DA	64-55-20	.0	.00	.00
LIC	AK BLTVL-960823JB		522 max.	147-42-55			
Name :	TANANA VALLEY TELEVISION COMPANY						
K13XD	FAIRBANKS	13	0.74 DA	64-55-20	.0	.00	.00
APP	AK BMPTVL-960517UG		522 max.	147-42-55			
Name :	TANANA VALLEY TELEVISION COMPANY						
K14JL	FAIRBANKS	14	29.4 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JZ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K16DW	FAIRBANKS	16	29.5 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JY		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K18ED	FAIRBANKS	18	28.4	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960610JA		731 max.	148-03-10			
Name :	GREENTV CORP.						
K20FF	FAIRBANKS	20	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JX		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K22EY	FAIRBANKS	22	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960529JW		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K24EG	FAIRBANKS	24	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JV		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K26EL	FAIRBANKS	26	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JU		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K28ES	FAIRBANKS	28	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KJ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K30ET	FAIRBANKS	30	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JK		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K34EJ	FAIRBANKS	34	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JJ		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K36ED	FAIRBANKS	36	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KI		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K38EL	FAIRBANKS	38	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JL		736 max.	148-03-10			

Name : GOLDBELT, INC.

Call Status	City State FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km)	(mile)
K40EN	FAIRBANKS	40	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JT		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K42EC	FAIRBANKS	42	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JS		736 max.	148-03-10			
Name :	GOLDBELT, INC.						
K44EK	FAIRBANKS	44	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JR		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K46EH	FAIRBANKS	46	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JP		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K48FG	FAIRBANKS	48	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JN		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K50EH	FAIRBANKS	50	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KA		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K52EY	FAIRBANKS	52	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KB		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K54EW	FAIRBANKS	54	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KC		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K56FX	FAIRBANKS	56	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KD		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K60FQ	FAIRBANKS	60	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KE		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K62FB	FAIRBANKS	62	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KF		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K64EU	FAIRBANKS	64	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KG		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K66FG	FAIRBANKS	66	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509KH		751 max.	148-03-10			
Name :	GOLDBELT, INC.						
K68EZ	FAIRBANKS	68	30 DA	64-52-44	253.3	16.71	10.39
LIC	AK BLTTL-960509JM		751 max.	148-03-10			
Name :	GOLDBELT, INC.						

** End of LPTV Within Study **